

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington DC 20554**

In the Matter of) RM-10867
Amendment of Part 97 of the)
Commission's Rules Governing the)
Amateur Radio Service to Implement)
Changes to Article 25 of the International)
Radio Regulations Adopted at the 2003)
WRC Meeting.	

A Reply to the Comments of Charles L. Young, AG4YO

I, Albert J. Schramm, am a licensed amateur and an annual member of the American Radio Relay League. I enjoy no position or privilege beyond that of any other annual member of the League. The statements I put forth in this filing are my own and not necessarily those of the League or any other member thereof. I have already filed a comment on RM-10867, and come now before the Commission to rebut a comment I feel warrants challenge.

In his comment on RM-10867, Mr Young sets forth six primary objections to the proposal put forward by the American Radio Relay League. The following objections are quoted from Mr Young's comment, now on file on the FCC ECFS website:

- A. The Petition does not represent the views of a majority of ARRL members.
- B. The Petition does nothing to attract "the youth of our country."
- C. The Petition calls for the Unnecessary Creation of a New License Class [sic].
- D. The petition calls for the unnecessary removal of Telegraphy testing for General Class [sic]
- E. The ARRL has failed to make adequate retention efforts.
- F. Combination of Technician and General Class Licensees is not a prudent or fair action [sic].

I do not wish to belabor points at issue in Mr Young's filing and waste the Commission's time with superfluous rhetoric; I will give a simple and direct reply to each of his six stated objections, and then add a final comment.

A. The Majority View.

It should be noted that the American Radio Relay League is a voluntary membership organization that now has more than 150,000 members according to the audited figures published in the December, 2003, issue of the League's

magazine, *QST*. The leadership of the ARRL is vested in a Board of Directors that is tied closely to a field organization that maintains liaison with the membership.

The League operates by representative governance rather than town meeting. Leadership is elected and expected to exercise judgment, not to put forth costly polls to solicit more than 150,000 individual viewpoints on issues that must be decided and acted upon with a reasonable degree of celerity. While no poll of the membership was taken, the ARRL leadership is sufficiently close to the views and needs of members to make decisions based upon their own judgment and experience. That is why we elect them.

The decision to submit the proposal now titled RM-10867 was made by the elected Board, and it was the subject of meetings, arbitrations and detailed draftings before the final proposal was submitted to the FCC. Mr Young's charge that the "ARRL Leadership cannot demonstrate that RM-10867 represents the views of its membership" is totally without substantiation, as is his charge that there was any effort to "suppress a membership polling process."

Finally, Mr Young asserts a measure of hubris when he purports to speak "on behalf of the majority of members who were not allowed to express an official opinion."

I submit to you, the ARRL has more authority to speak for the majority of American amateur radio licensees than does Mr Young.

B. Attraction of Youth.

Mr Young offers the assertion that "the petitioners sought to make changes in the Amateur licensing structure (decided in 98-143) related to the ability of Amateur Radio to attract younger applicants" and further "that the suggestions offered by the ARRL have failed" [underscoring in the original].

Mr Young builds a series of unsupported allegations through two pages of what purports to be analysis to come to the conclusion "that all efforts by the ARRL to attract younger amateurs by proposing a relaxing of licensing requirements have failed and the logical conclusion is that giving away more HF access is not the answer" [underscoring in the original].

I suggest that the real and underlying motive for Mr Young's objections is clearly on view in the paragraph immediately above: **it is the threat of opening HF bands to more operators that animates Mr Young's comments against RM-10867, as well as those of many, if not most, of the negative comments filed against this proposal to date.**

Mr Young offers no new or unique counter to any of the League's efforts to attract youth to the Amateur Service. He presents no program or proposal of his own, merely an insistence that the work of the League has been demonstrated to be wholly without merit. I believe the evidence in growth of overall license numbers is a sufficient counter to this charge.

C. Unnecessary Creation of a New Entry Class.

In setting out his reasons for citing a change in entry license status, Mr Young goes to considerable lengths expressing his desire to ease the Commission's burdens by restricting HF access and keeping the Technician license as the "entry" license. Nowhere, however, does Mr Young allude to the Commission's stated desire to reduce license classes to three, nor does he consider the current power and operating privileges of Technician licensees vis-à-vis those of the current Novice class. Careful reading reveals that Mr Young's proposal is but another ploy put forth to keep more people off of the HF bands he favors:

"Clearly the action that best meets the FCC requirement to limit additional work and the ARRL desire to let entry level Amateurs experience worldwide communications is to simply give the HF privileges as outlined for the proposed 'Novice' class to existing Technicians."
[Underscoring in original.]

Mr Young would have the Commission relegate all current Technicians and Technician Plus licensees, as well as those remaining Novice licensees to a safe and segregated "sanctuary" well away from those bands on which Mr Young would reserve as an elite preserve for current General, Advanced and Extra classes.

Mr Young leaps to the illogical conclusion that "the most expeditious, the least burdensome, the most fair [sic] decision would be to deny the ARRL request...."

The ARRL proposal urges upgrading not to cause problems for the Commission, but to reduce them by quickly arriving at three license classes with the minimum of administrative burden. **Moving existing Tech and Tech Plus licensees to General means that no action need be taken on those licenses in the ULS database unless and until those licensees renew, modify or upgrade their licenses, at which time administrative action will be required under any circumstances.**

The ARRL's proposed route **is** the most expeditious, the least burdensome and, indeed, the fairest course, not the band-protection ploy put forward by Mr Young.

D. Unnecessary Removal of Telegraphy Testing...

In his discussion of the merits of retaining manual telegraphy testing for General licensees, as opposed the plan offered in RM-10867 to retain the telegraphy test only for Extra, Mr Young uses six paragraphs to, in effect, "whistle past the grave yard" on his way to build what is **nothing more than another current-license band-protection scheme.**

Mr Young would have us believe that removing the mandatory telegraphy test for General licensees will somehow do irreparable harm to amateur radio. Turning the result of WRC-2003 upside down, Mr Young comments: "nothing in the WRC prohibits the retention of telegraphy testing" [underscore in original]. He further offers the hopeful reminder that WRC contains no "directed mandate" to remove the telegraphy test, though a growing number of other countries have done so.

Through the six paragraphs, Mr Young clearly fails to establish that any harm whatsoever would result from the removal of manual telegraphy testing **for any license class**, yet the proposal he vigorously opposes requests **removal** only for those classes under Extra. RM-10867 urges retention of the telegraphy test for that maximal license class.

E. Failure to Mark Adequate Retention Efforts.

Through another six paragraphs, Mr Young takes the ARRL to task for what he considers a misfeasance or nonfeasance that is very difficult to follow. He accuses the League of not doing “an adequate job of implementing the spirit of 98-143.” He cites his own admittedly “unscientific” poll of amateurs in his community who have not remained active in amateur radio, listing the top reasons for this inactivity as, and I paraphrase, lack of time, lack of interest, and lack of imagination. Astonishingly, he puts the onus for all of these failures on the part of individuals on the League: The League has not done enough.

It is not until the final paragraph of this track that Mr Young’s real motive emerges once again:

“Once Technicians have HF privileges in lieu of the proposed ‘Novice’ class, and with the lack of a track record from the League, we [sic] think it fair that the Commission not accept suggestions **for giving away more access to HF, deleting telegraphy testing**, or making written tests easier, until the League demonstrates that they have made an honest effort at using other more conventional retention practices.” [Bold emphasis added; underscoring in original.]

Mr Young’s repeated *cri de coeur* against any added access to HF bands for more amateurs becomes ever clearer.

F. Combination of Technician and General Class Licenses.

Through another five paragraphs, Mr Young cites reasons to reject the proposed upgrading of Technician licenses to General. He refers to the proposal as “capricious,” as though neither thought nor calculation were ever part of the decision process through which the League’s Directors worked before arriving at this concept.

He refers to “[t]his infusion of untrained operators will serve to neither promote the mode, nor will it constitute fair treatment of General licensees who had to pass Element 1 as a minimum qualification.” [Again, the underscoring is in the original.] In berating the League over his perception of this fairness issue, Mr Young says, “I am sure General Class operators will reflect this point in comment to RM-10867.” In fact, the comments being filed seem overwhelmingly in favor of the League’s proposal.

I would remind both the Commission and Mr Young that *all* operators are untrained when first exercising their new license privileges, at whatever level the entry took place. It is a process of mentoring, “elmering,” if you will, that leads the newly coined amateur to operating skills, experience and acceptance by his or

her peers over time. Without an adequate range of operating “room” on bands that offer elevated interest, however, this process is short-circuited and results in the loss of bored licensees over a relatively short period of time. Walling them off from other experienced operators is exactly what is **not** desired.

Conclusion:

It is hard to imagine why Mr Young remains a member of an organization he so venomously demeans. It would seem that the ARRL, given his viewpoint, is the anathema to the nation’s amateur radio licensees, instead of their primary booster and single, most effective representative. Taken as a whole, Mr Young’s comment is so burdened by a pronounced bitterness that it is hard to take his suggestions as anything more than gainsaying for no other purpose than to cling to the status quo and put hurdles in the path of any and all advancement should it be introduced and/or promoted by the ARRL.

He would offer himself as the sole arbiter of what is best for Amateur Radio, and that in substitution for the solitary organization which represents the majority of today’s active amateurs. I do not herein demean Mr Young in any way, but I urge the Commission to regard his comments as those of a man urging on the Commission a romanticized view of an imagined past, whereas the ARRL is trying to achieve a clear and compelling vision of an available future.

RM-10867 is a compromise. It is a proposal that has been carefully crafted to keep the best of Amateur Radio’s honored traditions and appeal to the broadest range of amateurs, while amending the rules, procedures and requirements to more effectively match the needs of the nation as we move forward in the 21st century. I urge its adoption within the earliest possible time.

Respectfully submitted, May 3, 2004,

/s/ Albert J. Schramm, W3MIV